

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	
-v.-	:	
\$278,640.00 IN U.S. CURRENCY,	:	DECLARATION OF
	:	ASSISTANT UNITED STATES
	:	ATTORNEY SAMUEL P. ROTHSCHILD
	:	IN SUPPORT OF A
Defendant- <i>in-rem</i> .	:	<u>JUDGMENT OF FORFEITURE</u>
	:	24 Civ. 3725 (DEH)
	:	
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STATE OF NEW YORK)
COUNTY OF NEW YORK : ss.:
SOUTHERN DISTRICT OF NEW YORK)

SAMUEL P. ROTHSCHILD, under penalty of perjury, declares:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York, attorney for plaintiff herein. I have responsibility for the above-captioned matter, and, as such, I am familiar with the facts and circumstances of this case. This Declaration is submitted in support of the Government's application for a Judgment of Forfeiture with respect to the above-captioned Defendant-*in-rem*.

2. On May 15, 2024, the United States commenced an *in-rem* forfeiture action seeking the forfeiture of the Defendant-*in-rem*, by the filing of a Verified Complaint for Forfeiture (the "Verified Complaint"). The Verified Complaint alleged that the Defendant-*in-rem* is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. Beginning on or about May 18, 2024, and continuing through on or about June 16, 2024, the Government published notice of the Verified Complaint against the Defendant-

in-rem (the “Notice”) on the official government internet site, www.forfeiture.gov, for at least 30 consecutive days, and proof of such publication was filed with the Clerk of this Court on July 31, 2024 (D.E. 6).


4. As set forth in Rule G(4)(a)(ii) and Rule G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the Notice specified the Defendant-*in-rem* and the intent of the United States to forfeit and dispose of the Defendant-*in-rem*, thereby notifying all third parties of their right to file a claim to adjudicate the validity of their alleged legal interest in the Defendant-*in-rem*, within sixty days from the first day of publication of the Notice on the official government internet site.

5. No claims or answers have been filed or made in this action, and no other parties have appeared to contest the action, and the requisite time periods in which to do so, as set forth in Title 18, United States Code, Section 983(a)(4)(A), and Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, have expired.

6. Accordingly, the Government respectfully requests that the Court enter the proposed Judgment of Forfeiture attached hereto as Exhibit A.

7. There has been no prior application for the relief sought herein. I declare the foregoing to be true and correct pursuant to Title 28, United States Code, Section 1746.

Dated: New York, New York
July 31, 2024



SAMUEL P. ROTHSCILD
Assistant United States Attorney